

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER REGARDING SEALING
OF PLAINTIFFS' MOTION TO
COMPEL AMAZON TO PRODUCE
DOCUMENTS AND
INFORMATION RESPONSIVE TO
PLAINTIFFS' SEVENTH SET OF
REQUESTS FOR PRODUCTION
AND FOURTH SET OF
INTERROGATORIES

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

1 The Parties have met and conferred with respect to Plaintiffs' intended Motion to Compel
2 Amazon to Produce Documents and Information Responsive to Plaintiffs' Seventh Set of
3 Requests for Production and Fourth Set of Interrogatories, and anticipate that their briefs,
4 declarations, and exhibits will quote from and/or describe in detail a significant amount of
5 information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes
6 Only by Amazon. Accordingly, in order to ensure that such materials are treated appropriately
7 under the applicable protective order, and to reduce burdens on the Court, the Parties, pursuant to
8 LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree to the following
9 procedure for filing and sealing in connection with the motion to compel briefing, subject to the
10 Court's approval.

11 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its brief,
12 declarations, exhibits, and all other evidence on which that Party relies which contain material
13 designated Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

14 2. By August 8, pursuant to LCR 5(g), the Parties will meet and confer and, as
15 appropriate, file (1) public versions of their briefs, with necessary redactions, and (2)
16 corresponding motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material
17 under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal
18 associated with the Parties' Papers.

19 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.
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DATED July 3, 2025.

Respectfully submitted,

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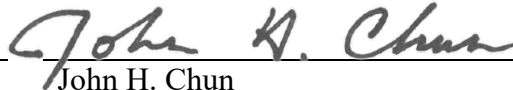
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1 IT IS SO ORDERED.

2
3 July 3, 2025

4 Dated



John H. Chun

United States District Judge